UNITED STATES ENVIRONMENTAL PROTECTION AGENCY



REGION VIII

999 18th STREET - SUITE 500 DENVER, COLORADO 80202-2466

12-2

NOV - 3 1997

Ref: 8EPR-EP

Ben Delvillar Acting Forest Supervisor White River National Forest P.O. Box 948 Glenwood Springs, CO 81602

Re: South Quartzite Timber

Sale, Draft Environmental

Impact Statement

Dear Mr. Delvillar:

In accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act, the Region VIII office of the Environmental Protection Agency (EPA) has reviewed the above-referenced Draft Environmental Impact Statement (DEIS). We submit the following concerns and comments for your consideration in preparation of the final EIS.

The EPA understands the proposed action will construct roads and salvage harvest dead Englemann spruce to reduce natural fuel loadings and help meet the Forests' ASQ (allowable sale quantity). The planning area is on the Rifle Ranger District and is located in Garfield County, Colorado. Under the Proposed Action, Alternative 2, an estimated 4.0 millon board feet (MMBF) will be salvage harvested from approximately 1,270 acres. Helicopter yarding will be employed on 1,160 acres and ground-based yarding on 110 acres. To access these landings and the timber, 1.25 miles of temporary road would be reconstructed and 0.25 miles of new temporary road will be constructed.

We note on p. 12 and p. 2-12 that the discussion related to miles of temporary road is somewhat confusing. 1.0 plus 0.9 does not add up to 1.25. Maybe the miles of temporary road can be explained differently. We do understand that all temporary roads associated with the project plus 0.3 miles of existing road will be closed by removing culverts, restoring natural configurations, ripping roads to a depth of 12 to 18 inches, placing live and dead logs perpendicular to the road surface, and placing soil, rocks and other woody debris to a density that mimics existing conditions.

Under the Proposed Action, Alternative 2, helicopter yarding would be used. The intent is to operate an estimated 59 days and to complete helicopter operations during one operating season

between July 15 and October 10. It would be most helpful to a reviewer to be provided with a discussion of helicopter yarding.

Discussion on page 2-6 under WILDLIFE, related to snags and their proposed location refers to "...new Forest service direction and OSHA regulations for loggers safety." It would be helpful to briefly expand on the Forest Service direction to inform the reviewer on what precautions are proposed to ensure that already weakened snag root structure will not be further weakened by helicopter rotor downwash during helicopter yarding.

In the seventh paragraph on page 3-32, it is unclear in the second sentence which noxious weed is being referenced.

Will Figure 3.3 South Quartzite Existing and Open Roads, on p. 3-64 be available in the FEIS?

Based on the procedures the EPA uses to evaluate the adequacy of the information and the potential environmental impacts of the proposed action and alternatives in an EIS, the EPA Region VIII rates this DEIS as Category 2. This means that additional information, as noted, would allow us to more fully assess proposed action environmental impacts. A copy of our rating criteria is attached.

You will note that these comments are past the requested comment date. For some reason the EPA Region VIII did not receive copies for review during the published review period. When this error was noted, copies were requested from the White River National Forest for review. The EPA does appreciate the opportunity to review and comment on the DEIS. Should you have any questions, please contact Mike Hammer of my staff at (303) 312-6563.

Sincerely.

Carol L. Campbell, Director Ecosystems Protection Program

Carol L. Compbell

cc: Elaine Suriano, OFA EPA-HQ Doug Lofstedt